

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)) Chapter 11
YELLOW CORPORATION, et al., ¹)) Case No. 23-11069 (CTG)
Debtors.)) (Jointly Administered)
)	Re: Docket Nos. 6514, 6521
))
JEFF MOORE, ELIZABETH BROOKE MOORE, and VIDAL TORRES on behalf of themselves and all others similarly situated,)	Adv. Pro. No. 23-50457 (CTG)
Plaintiffs,))
v.)	Re: Docket No. 246
YELLOW CORPORATION, et al.,))
Defendants.))
))

SECOND AMENDED² NOTICE OF AGENDA FOR HEARING SCHEDULED ON JUNE 17, 2025 AT 10:00 A.M. (PREVAILING EASTERN TIME) BEFORE THE HONORABLE CRAIG T. GOLDBLATT AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, LOCATED AT 824 NORTH MARKET STREET, 5th FLOOR, COURTROOM NO. 5, WILMINGTON, DELAWARE 19801³

This proceeding will be conducted in-person. All counsel and witnesses are expected to attend unless permitted to appear remotely via Zoom. Please refer to Judge Goldblatt's Chambers Procedures <https://www.deb.uscourts.gov/judge-craig-t-goldblatt> and the Court's website <https://www.deb.uscourts.gov/ecourt-appearances> for information on who may participate remotely, the method of allowed participation (video or audio), Judge Goldblatt's expectations of remote participants, and the advance registration requirements. Registration is required by 4:00 p.m. (Eastern time) the business day before the hearing unless otherwise noticed using the eCourtAppearances tool available on the Court's website.

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of the Debtors' principal place of business and the Debtors' service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

² Amended items are noted in bold.

³ Please note: the hearing location has changed to Courtroom No. 5 on the 5th Floor.

RESOLVED MATTERS:

1. [Jeff Moore and Elizabeth Brooke Moore v. Yellow Corporation – Adv. 23-50457] Fairness Hearing Regarding [Signed] Order Pursuant to 11 U.S.C. § 105 and Fed. R. Bankr. P. 7023 and 9019 to (I) Approving the Settlement Agreement, (II) Approving the Form and Manner of Notice to Class Members of the Settlement, (III) Scheduling a Fairness Hearing to Consider Final Approval of the Settlement Agreement, and (IV) Granting Related Relief [Filed: 3/24/25] ([Docket No. 5951](#)) (Adv. 23-50457, [Docket No. 236](#))

Response Deadline: December 23, 2024, at 4:00 p.m. (ET)

Responses Received: None.

Related Documents:

- A. Joint Motion Pursuant to 11 U.S.C. § 105 and Fed. R. Bankr. P. 7023 and 9019 to (I) Approve a Settlement Pursuant to Fed. R. Bankr. P. 9019, (II) Preliminarily Approve the Settlement Pursuant to Fed. R. Bankr. P. 7023, (III) Approve the Form and Manner of Settlement Notice to Class Members, (IV) Schedule a Fairness Hearing to Consider Final Approval of the Settlement, (V) Finally Approve the Settlement Pursuant to Fed. R. Bankr. P. 7023 After the Fairness Hearing, and (VI) Grant Related Relief [Filed: 2/28/25] ([Docket No. 5823](#)) (Adv. 23-50457, [Docket No. 234](#))
- B. [Signed] Final Order Approving WARN Class Action Settlement Agreement [Filed: 6/5/25] (Adv. 23-50457, [Docket No. 243](#))

Status: The Court has entered a final order resolving this matter.

2. Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Assume a Certain Unexpired Lease and (II) Granting Related Relief [Filed: 3/31/25] ([Docket No. 6003](#))

Response Deadline: April 14, 2025, at 4:00 p.m.

Responses Received:

- A. Objection of Freight Line Properties, LLC to Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Assume a Certain Unexpired Lease and (II) Granting Related Relief [Filed: 4/30/25] ([Docket No. 6205](#))
- B. Joinder of the Official Committee of Unsecured Creditors to (A) Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Assume a Certain Unexpired Lease and (II) Granting Related Relief and (B) Debtors' Reply in Further Support of Debtors Motion for Entry of an Order (I) Authorizing the Debtors to Assume a Certain Unexpired Lease and (II) Granting Related Relief [Filed: 5/9/25] ([Docket No. 6275](#))

Reply Deadline: May 9, 2025, at 4:00 p.m.

Replies Received:

- A. Debtors' Reply in Further Support of Debtors Motion for Entry of an Order (I) Authorizing the Debtors to Assume a Certain Unexpired Lease and (II) Granting Related Relief [Filed: 5/9/25] ([Docket No. 6271](#))
- B. Joinder of MFN Partners, LP and Mobile Street Holdings, LLC to the Debtors' Reply in Further Support of the Court's Entry of Proposed Order (I) Authorizing the Debtors to Assume a Certain Unexpired Lease and (II) Granting Related Relief [Filed: 5/9/25] ([Docket No. 6274](#))

Related Documents:

- A. [Proposed] Order (I) Authorizing the Debtors to Assume a Certain Unexpired Lease and (II) Granting Related Relief [Filed: 3/31/25] ([Docket No. 6003, Exhibit A](#))
- B. Supplemental Declaration of Cody Leung Kaldenberg in Further Support of the Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Assume a Certain Unexpired Lease and (II) Granting Related Relief [Filed: 5/9/25] ([Docket No. 6272](#))
- C. Notice of Revised Proposed Order (A) Authorizing the Debtors to Assume a Certain Unexpired Lease and (B) Granting Related Relief [Filed: 5/9/25] ([Docket No. 6279](#))
- D. Certification of Counsel Regarding Stipulated Order (A) Authorizing the Debtors to Assume a Certain Unexpired Lease and (B) Granting Related Relief [Filed: 6/9/25] ([Docket No. 6481](#))
- E. [Signed] Stipulated Order (A) Authorizing the Debtors to Assume a Certain Unexpired Lease and (B) Granting Related Relief [Filed: 6/10/25] ([Docket No. 6489](#))

Status: The Court has entered an order resolving this matter.

3. Debtors' Thirtieth Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 4/14/25] ([Docket No. 6067](#))

Response Deadline: April 28, 2025, at 4:00 p.m. (*extended until May 19, 2025 at 4:00 p.m. (ET) for Gartner, Inc.*)

Responses Received:

- A. Gartner, Inc.

Related Documents:

- A. [Proposed] Order Sustaining Debtors' Thirtieth Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 4/30/25] ([Docket No. 6067, Exhibit A](#))
- B. Notice of Submission of Proofs of Claim in Connection with Debtors' Thirtieth Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 4/30/25] ([Docket No. 6207](#))
- C. Certification of Counsel Regarding Debtors' Thirtieth Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 5/9/25] ([Docket No. 6278](#))
- D. Certification of Counsel Regarding Order Approving Stipulation Regarding Allowance of the Claim of Gartner, Inc. [Filed: 5/16/25] ([Docket No. 6340](#))
- E. [Signed] Order Approving Stipulation Regarding Allowance of the Claim of Gartner, Inc. [Filed: 5/16/25] ([Docket No. 6342](#))
- F. [Signed] Order Sustaining Debtors' Thirtieth Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 6/12/25] ([Docket No. 6505](#))

Status: The Court has entered an order resolving this matter.

4. Motion of Debtors for Entry of an Order (I) Approving the Settlement Agreement By and Among the Debtors and Carlos Rodriguez and (II) Granting Related Relief [Filed: 5/1/25] ([Docket No. 6214](#))

Response Deadline: May 23, 2025, at 4:00 p.m. (ET)

Responses Received: None as of the date of this Notice of Agenda.

Related Documents:

- A. [Proposed] Order (I) Approving the Settlement Agreement By and Among the Debtors and Carlos Rodriguez and (II) Granting Related Relief [Filed: 5/1/25] ([Docket No. 6214, Exhibit A](#))
- B. Certification of No Objection Regarding Motion of Debtors for Entry of an Order (I) Approving the Settlement Agreement By and Among the Debtors and Carlos Rodriguez and (II) Granting Related Relief [Filed: 6/11/25] ([Docket No. 6501](#))
- C. [Signed] Order (I) Approving the Settlement Agreement By and Among the Debtors and Carlos Rodriguez and (II) Granting Related Relief [Filed: 6/12/25] ([Docket No. 6502](#))

Status: The Court has entered an order resolving this matter.

ADJOURNED MATTERS:

- 5. Motion of the Pension Benefit Guaranty Corporation for Allowance and Payment of Premiums as Administrative Expense [Filed: 12/9/24] ([Docket No. 5096](#))

Response Deadline: December 23, 2024, at 4:00 p.m. (ET)

Responses Received:

- A. Debtors' Objection to Motion of the Pension Benefit Guaranty Corporation for Allowance and Payment of Premiums as Administrative Expense [Filed: 12/23/24] ([Docket No. 5269](#))

Reply Deadline: January 15, 2025, at 4:00 p.m. (ET)

Replies Received:

- A. Reply of the Pension Benefit Guaranty Corporation in Support of Motion for Allowance and Payment of Premiums as Administrative Expense [Filed: 1/15/25] ([Docket No. 5410](#))

Related Documents:

- A. [Proposed] Order Granting Motion of the Pension Benefit Guaranty Corporation for Allowance and Payment of Premiums as Administrative Expense [Filed: 12/9/24] ([Docket No. 5096](#))

Status: This matter is adjourned by agreement to the omnibus hearing on August 4, 2025, at 10:00 a.m. (ET).

- 6. Motion by Direct Chassislink Inc. for Allowance and Payment of Administrative Expense Claim [Filed: 2/24/25] ([Docket No. 5799](#))

Response Deadline: March 26, 2025, at 4:00 p.m. (*extended for the Debtors and the Official Committee of Unsecured Creditors until June 11, 2025, at 4:00 p.m. (ET)*)

Responses Received: None as of the date of this Notice of Agenda.

Related Documents:

- A. [Proposed] Order Granting Motion by Direct Chassislink Inc. for Allowance and Payment of Administrative Expense Claim [Filed: 2/24/25] ([Docket No. 5799](#))
- B. Amended Notice of Motion by Direct Chassislink Inc. for Allowance and Payment of Administrative Expense Claim [Filed: 3/11/25] ([Docket No. 5863](#))

Status: This matter is adjourned by agreement to the omnibus hearing on July 8, 2025, at 10:00 a.m. (ET).

- 7. Debtors' Twenty-Ninth Omnibus (Non-Substantive) Objection to Claims Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 4/14/25] ([Docket No. 6066](#))

Response Deadline: April 28, 2025, at 4:00 p.m.

Responses Received:

- A. Response to Debtors' Twenty-Ninth Omnibus (Non-Substantive) Objection to Claims [Filed by Prologis USLV SubReit 4, LLC] [Filed: 4/28/25] ([Docket No. 6195](#))
- B. PNC Bank, National Association's Response to Debtors' Twenty-Ninth Omnibus (Non-Substantive) Objection to Claims Pursuant to Bankruptcy Code, Section 502(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 4/28/25] ([Docket No. 6196](#))
- C. Response of Andrew Canton to Debtors' Twenty-Ninth Omnibus (Non-Substantive) Objection to Claims [Filed: 4/29/25] ([Docket No. 6198](#))

Related Documents:

- A. [Proposed] Order Sustaining Debtors' Twenty-Ninth Omnibus (Non-Substantive) Objection to Claims Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 4/14/25] ([Docket No. 6066, Exhibit A](#))
- B. Notice of Submission of Proofs of Claim in Connection with Debtors' Twenty-Ninth Omnibus (Non-Substantive) Objection to Claims Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 4/30/25] ([Docket No. 6206](#))
- C. Certification of Counsel Regarding Debtors' Twenty-Ninth Omnibus (Non-Substantive) Objection to Claims Pursuant to Bankruptcy Code Section 502(b),

Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 5/9/25] ([Docket No. 6277](#))

- D. [Signed] Order Sustaining Debtors' Twenty-Ninth Omnibus (Non-Substantive) Objection to Claims Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 6/6/25] ([Docket No. 6459](#))

Status: The Court has entered an order on the omnibus objection, with the exception of claim numbers 19891 and 19938 filed by Prologis USLV Subreit 4 LLC ("Prologis"). The Debtors and Prologis have agreed to adjourn the hearing on the omnibus objection to the omnibus hearing on July 8, 2025 at 10:00 a.m. (ET).

8. [Alonso Rios] Motion for Relief From Automatic Stay to Permit the State Court Civil Litigation to Proceed [Filed: 5/16/25] ([Docket No. 6344](#))

Response Deadline: June 9, 2025 at 4:00 p.m. (ET)

Responses Received:

- A. Debtors' Objection to Motion of Alonso Rios for Relief From Automatic Stay to Permit the State Court Civil Litigation to Proceed [Filed: 6/9/25] ([Docket No. 6471](#))
- B. Joinder of the Official Committee of Unsecured Creditors to Debtors' Objection to Motion of Alonso Rios for Relief From Automatic Stay to Permit the State Court Civil Litigation to Proceeds [Filed: 6/9/25] ([Docket No. 6472](#))

Related Documents:

- A. Notice of Motion for Relief From Automatic Stay [Filed: 5/16/25] ([Docket No. 6346](#))

Status: This matter is adjourned by agreement to a date to be determined.

9. Debtors' Objection to Western Conference of Teamsters' Proofs of Claim for Withdrawal Liability [Filed: 5/16/25] ([Docket No. 6347](#))

Response Deadline: June 9, 2025 at 4:00 p.m. (ET) (*extended until June 27, 2025, at 4:00 p.m. for the Western Conference of Teamsters*)

Responses Received:

- A. Joinder of MFN Partners, LP and Mobile Street Holdings, LLC to the Debtors' Objection to Western Conference of Teamsters' Proofs of Claim for Withdrawal Liability [Filed: 5/19/25] ([Docket No. 6351](#))

Status: This matter is adjourned by agreement to the omnibus hearing on July 8, 2025, at 10:00 a.m. (ET).

MATTERS UNDER COC/CNO:

10. Debtors' Motion for Entry of an Order (I) Approving Certain Asset Purchase Agreements; (II) Authorizing and Approving Sales of Certain Properties of the Debtors Free and Clear of Liens, Claims, Interests, and Encumbrances, in Each Case Pursuant to the Applicable Asset Purchase Agreement; (III) Approving the Assumption and Assignment of Certain Unexpired Leases in Connection Therewith as Applicable; and (IV) Granting Related Relief [Filed: 5/5/25] ([Docket No. 6226](#))

Response Deadline: May 19, 2025, at 4:00 p.m. (ET) (*extended for Link Logistics to June 19, 2025*)

Responses Received:

- A. Informal response of Link Logistics

Related Documents:

- A. [Proposed] Order (I) Approving Certain Asset Purchase Agreements; (II) Authorizing and Approving Sales of Certain Properties of the Debtors Free and Clear of Liens, Claims, Interests, and Encumbrances, in Each Case Pursuant to the Applicable Asset Purchase Agreement; (III) Approving the Assumption and Assignment of Certain Unexpired Leases in Connection Therewith as Applicable; and (IV) Granting Related Relief [Filed: 5/5/25] ([Docket No. 6226, Exhibit A](#))
- B. Declaration of Cody Leung Kaldenberg in Support of Entry of an Order (I) Approving Certain Asset Purchase Agreements; (II) Authorizing and Approving Sales of Certain Properties of the Debtors Free and Clear of Liens, Claims, Interests, and Encumbrances, in Each Case Pursuant to the Applicable Asset Purchase Agreement; (III) Approving the Assumption and Assignment of Certain Unexpired Leases in Connection Therewith as Applicable; and (IV) Granting Related Relief [Filed: 5/5/25] ([Docket No. 6227](#))
- C. Motion of Debtors for Entry of an Order Shortening Notice of Debtors' Motion for Entry of an Order (I) Approving Certain Asset Purchase Agreements; (II) Authorizing and Approving Sales of Certain Properties of the Debtors Free and Clear of Liens, Claims, Interests, and Encumbrances, in Each Case Pursuant to the Applicable Asset Purchase Agreement; (III) Approving the Assumption and Assignment of Certain Unexpired Leases in Connection Therewith as Applicable; and (IV) Granting Related Relief [Filed: 5/5/25] ([Docket No. 6228](#))
 - (i) [Signed] Order Shortening Notice of Debtors' Motion for Entry of an Order (I) Approving Certain Asset Purchase Agreements; (II) Authorizing and Approving Sales of Certain Properties of the Debtors Free and Clear of Liens, Claims, Interests, and Encumbrances, in Each Case Pursuant to the Applicable Asset Purchase Agreement; (III) Approving the Assumption and Assignment of Certain Unexpired Leases in Connection

Therewith as Applicable; and (IV) Granting Related Relief [Filed: 5/6/25] ([Docket No. 6238](#))

- D. Notice of Hearing on Debtors' Motion for Entry of an Order (I) Approving Certain Asset Purchase Agreements; (II) Authorizing and Approving Sales of Certain Properties of the Debtors Free and Clear of Liens, Claims, Interests, and Encumbrances, in Each Case Pursuant to the Applicable Asset Purchase Agreement; (III) Approving the Assumption and Assignment of Certain Unexpired Leases in Connection Therewith as Applicable; and (IV) Granting Related Relief [Filed: 5/7/25] ([Docket No. 6256](#))
- E. Notice of Corrected Exhibit for Saia Asset Purchase Agreement in Connection with the Debtors' Motion For Entry of An Order (I) Approving Certain Asset Purchase Agreements; (II) Authorizing and Approving Sales of Certain Properties of the Debtors Free and Clear of Liens, Claims, Interests, and Encumbrances, In Each Case Pursuant To the Applicable Asset Purchase Agreement; (III) Approving the Assumption and Assignment of Certain Unexpired Leases In Connection Therewith As Applicable; and (IV) Granting Related Relief [Filed: 5/8/25] ([Docket No. 6261](#))
- F. Notice of Rescheduled Hearing, Solely with Respect to Saia Asset Purchase Agreement, in Connection with the Debtors' Omnibus Sale Motion [Filed: 5/8/25] ([Docket No. 6270](#))
- G. Certification of Counsel Regarding Revised Order (I) Approving Certain Asset Purchase Agreements; (II) Authorizing and Approving Sales of Certain Properties of the Debtors Free and Clear of Liens, Claims, Interests, and Encumbrances in Each Case Pursuant to the Applicable Asset Purchase Agreement; and (III) Granting Related Relief [Filed: 5/13/25] ([Docket No. 6324](#)).
- H. Order (I) Approving Certain Asset Purchase Agreements; (II) Authorizing and Approving Sales of Certain Properties of the Debtors Free and Clear of Liens, Claims, Interests, and Encumbrances, In Each Case Pursuant to the Applicable Asset Purchase Agreement; and (III) Granting Related Relief [Filed: 5/14/25] ([Docket No. 6326](#)).
- I. Certification of Counsel Regarding Order Approving Saia Asset Purchase Agreement [Filed: TBD] (Docket No. TBD).

Status: The Debtors anticipate submitting a revised order under certification of counsel as soon as documentation is completed. In the meantime, the parties have agreed to adjourn this matter.

- 11. Debtors' Thirty-First Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 5/16/25] ([Docket No. 6348](#))

Response Deadline: June 6, 2025 at 4:00 p.m. (ET)

Responses Received:

- A. Response of Vitaliy Levchuk [Filed: 5/30/25] ([Docket No. 6419](#))
- B. Informal response from Mobile Street
- C. Informal response from Parkland USA Corporation
- D. Informal response from Seko Worldwide
- E. Informal response from Interstate Express
- F. Informal response from THK Trucking

Related Documents:

- A. [Proposed] Order Sustaining Debtors' Thirty-First Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 5/16/25] ([Docket No. 6348](#), [Exhibit A](#))
- B. Notice of Submission of Proofs of Claim in Connection with Debtors' Thirty-First Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 6/2/25] ([Docket No. 6434](#))
- C. **Certification of Counsel Regarding Debtors' Thirty-First Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 6/16/25]** ([Docket No. 6526](#))
- D. **Notice of Withdrawal of the Claims of Interstate Express Inc. and THK Trucking Inc. from the Debtors' Thirty-First Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 6/16/25]** ([Docket No. 6527](#))

Status: The Debtors have filed certification of counsel with a revised proposed sale order and respectfully request entry of the revised sale order at the Court's convenience.

MATTERS GOING FORWARD:

- 12. Debtors' Twenty-Eighth Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 3/7/25] ([Docket No. 5851](#))

Response Deadline: March 24, 2025, at 4:00 p.m.

Responses Received:

- A. Informal Response of Fred Dishner [Filed: 4/4/25] ([Docket No. 6021](#))
- B. Informal Response of David Lewis [Filed: 4/4/25] ([Docket No. 6022](#))

Related Documents:

- A. [Proposed] Order Sustaining Debtors' Twenty-Eighth Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 3/7/25] ([Docket No. 5851, Exhibit A](#))
- B. Notice of Submission of Proofs of Claim in Connection with Debtors' Twenty-Eighth Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 3/24/25] ([Docket No. 5952](#))
- C. Certification of Counsel Regarding Debtors' Twenty-Eighth Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 4/4/25] ([Docket No. 6023](#))
- D. [Signed] Order Sustaining Debtors' Twenty-Eighth Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 4/7/25] ([Docket No. 6027](#))
- E. Certification of Counsel Regarding Debtors' Twenty-Eighth Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 5/9/25] ([Docket No. 6276](#))
- F. [Signed] Order Sustaining Debtors' Twenty-Eighth Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 5/12/25] ([Docket No. 6288](#))
- G. **Debtors' Witness & Exhibit List for Hearing on June 17, 2025 at 10:00 a.m. (ET) With Respect to Debtors' Twenty-Eighth Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 6/16/25] ([Docket No. 6525](#))**

Status: The informal response of David Lewis (Claim Nos. 17619 and 18718) will go forward.

13. Motion of MFN Partners, LP and Mobile Street Holdings, LLC for Entry of an Order Converting the Debtors' Chapter 11 Cases to Cases Under Chapter 7 of the Bankruptcy Code [Filed: 4/29/25] ([Docket No. 6204](#))

Response Deadline: May 20, 2025 at 4:00 p.m. (ET)

Responses Received:

- A. Objection to Motion to Convert the Debtor's Chapter 11 cases to cases under Chapter 7 of the Bankruptcy Code Filed by Clifton Jerome Branton [Filed: 5/23/25] ([Docket No. 6402](#))
- B. Objection to Motion Converting The Debtors' Chapter 11 Cases to Cases Under Chapter 7 of The Bankruptcy Code Filed by Willy's Precision Towing [Filed: 5/28/25] ([Docket No. 6411](#))
- C. Letter in Response to Notice of Conversion Filed by Gary Fristrom [Filed: 5/28/25] ([Docket No. 6412](#))
- D. Objection of Debtors to Motion of MFN Partners, LP and Mobile Street Holdings, LLC for Entry of an Order Converting the Debtors' Chapter 11 Cases to Cases Under Chapter 7 of the Bankruptcy Code [Filed: 5/5/25] ([Docket No. 6225](#))
- E. Joinder of Equity Interest Holder Peter Levinson in Motion of MFN Partners, LP and Mobile Street Holdings, LLC for Entry of an Order Converting the Debtors' Chapter 11 Cases to Cases Under Chapter 7 of the Bankruptcy Code [Filed: 5/14/25] ([Docket No. 6330](#))
- F. Joinder of the Official Committee of Unsecured Creditors of Yellow Corporation, et al., to Objection of Debtors to Motion of MFN Partners, LP and Mobile Street Holdings, LLC for Entry of an Order Converting the Debtors' Chapter 11 Cases to Cases Under Chapter 7 of the Bankruptcy Code [Filed: 5/20/25] ([Docket No. 6355](#))
- G. Objection letter from Marvin Faulk to Motion to Convert [Filed: 5/21/25] ([Docket No. 6360](#))
- H. Letter in Response to Motion Converting The Debtors' Chapter 11 Cases to Cases Under Chapter 7 of The Bankruptcy Code Filed by Willy's Precision Towing Filed by George Campbell [Filed: 6/6/25] ([Docket No. 6460](#))
- I. Letter to Judge Goldblatt in Support of the Motion Filed by MFN Partners LP to Convert This Case from Chapter 11 to Chapter 7 Filed By YELLQ Equity Security Holder [Filed: 6/16/25] ([Docket No. 6518](#))
- J. Letter to Judge Goldblatt re Motion to Convert Filed by William Hill [Filed: 6/16/25] ([Docket No. 6519](#))

Replies Received:

- A. [SEALED] MFN Parties' Reply in Further Support of the Motion of MFN Partners, LP and Mobile Street Holdings, LLC for Entry of an Order Converting the Debtors' Chapter 11 Cases to Cases Under Chapter 7 of the Bankruptcy Code [Filed: 6/12/25] (Docket No. 6507).

Related Documents:

- A. [Proposed] Order Converting the Debtors' Chapter 11 Cases to Cases Under Chapter 7 of the Bankruptcy Code [Filed: 4/29/25] ([Docket No. 6204, Exhibit A](#))
- B. The Official Committee of Unsecured Creditors' Witness and Exhibit List for the Omnibus Hearing Scheduled for June 17, 2025, at 10:00 a.m. (Prevailing Eastern Time) [Filed: 6/13/25] ([Docket No. 6510](#))
- C. MFN Partners, LP and Mobile Street Holdings, LLC's Witness & Exhibit List for Hearing on June 17, 2025 [Filed: 6/13/25] ([Docket No. 6512](#))
- D. Debtors' Witness & Exhibit List for Hearing on June 17, 2025 at 10:00 a.m. (ET) [Filed: 6/13/25] ([Docket No. 6513](#))
- E. Amended MFN Partners, LP and Mobile Street Holdings, LLC's Witness & Exhibit List for Hearing on June 17, 2025 [Filed: 6/13/25] ([Docket No. 6517](#))

Status: This matter will go forward.

14. Debtors' Motion for Entry of an Order (I) Approving Certain Asset Purchase Agreements; (II) Authorizing and Approving Sales of Certain Properties of the Debtors Free and Clear of Liens, Claims, Interests, and Encumbrances, in Each Case Pursuant to the Applicable Asset Purchase Agreement; and (III) Granting Related Relief [Filed: 5/30/25] ([Docket No. 6428](#))

Response Deadline: June 16, 2025 at 4:00 p.m. (ET)

Responses Received: None as of the date of this Notice of Agenda.

Related Documents:

- A. [Proposed] Order (I) Approving Certain Asset Purchase Agreements; (II) Authorizing and Approving Sales of Certain Properties of the Debtors Free and Clear of Liens, Claims, Interests, and Encumbrances, in Each Case Pursuant to the Applicable Asset Purchase Agreement; and (III) Granting Related Relief [Filed: 5/30/25] ([Docket No. 6428, Exhibit A](#))
- B. Declaration of Cody Leung Kaldenberg in Support of Entry of an Order (I) Approving Certain Asset Purchase Agreements; (II) Authorizing and Approving Sales of Certain Properties of the Debtors Free and Clear of Liens, Claims,

Interests, and Encumbrances, in Each Case Pursuant to the Applicable Asset Purchase Agreement; and (III) Granting Related Relief [Filed: 5/30/25] ([Docket No. 6429](#))

- C. Motion of Debtors for Entry of an Order Shortening Notice of Debtors' Motion for Entry of an Order (I) Approving Certain Asset Purchase Agreements; (II) Authorizing and Approving Sales of Certain Properties of the Debtors Free and Clear of Liens, Claims, Interests, and Encumbrances, in Each Case Pursuant to the Applicable Asset Purchase Agreement; and (III) Granting Related Relief [Filed: 5/30/25] ([Docket No. 6430](#))
 - i. [Signed] Order Shortening Notice of Debtors' Motion for Entry of an Order (I) Approving Certain Asset Purchase Agreements; (II) Authorizing and Approving Sales of Certain Properties of the Debtors Free and Clear of Liens, Claims, Interests, and Encumbrances, in Each Case Pursuant to the Applicable Asset Purchase Agreement; and (III) Granting Related Relief [Filed: 6/2/25] ([Docket No. 6433](#))
- D. Notice of Hearing on Debtors' Motion for Entry of an Order (I) Approving Certain Asset Purchase Agreements; (II) Authorizing and Approving Sales of Certain Properties of the Debtors Free and Clear of Liens, Claims, Interests, and Encumbrances, in Each Case Pursuant to the Applicable Asset Purchase Agreement; and (III) Granting Related Relief [Filed: 6/2/25] ([Docket No. 6439](#))
- E. **Certification of Counsel Regarding Debtors' Motion for Entry of an Order (I) Approving Certain Asset Purchase Agreements; (II) Authorizing and Approving Sales Of Certain Properties of the Debtors Free and Clear of Liens, Claims, Interests, and Encumbrances, In Each Case Pursuant to the Applicable Asset Purchase Agreement; and (III) Granting Related Relief [Filed: 6/16/25] ([Docket No. 6524](#))**

Status: The Debtors have filed certification of counsel with a revised proposed sale order and respectfully request entry of the revised sale order at the Court's convenience.

Dated: June 16, 2025
Wilmington, Delaware

/s/ Peter J. Keane

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